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8 *Attorneys for GEICO Advantage Insurance  
9 Company*

10 UNITED STATES DISTRICT COURT

11 DISTRICT OF NEVADA

12 BRYAN HUMAN, an individual,

13 Plaintiff,

14 vs.

15 GEICO ADVANTAGE INSURANCE  
16 COMPANY, Inc.; DOES I-X; and ROE  
17 CORPORATIONS I-X, inclusive,

18 Defendants.

Case No. 2:21-cv-00166-RFB-EJY

**STIPULATION AND ORDER TO  
EXTEND DEADLINE TO SUBMIT  
PRETRIAL ORDER (Fifth Request)**

20 Pursuant to LR IA 6-1 and LR 26-3 and FRCP 26, the parties, by and through their  
21 respective counsel, respectfully submit this stipulation for extension of time to submit the Pre-  
22 Trial Order by a period of thirty (30) days. Counsel for the parties have conferred regarding this  
23 matter and agree that such an extension is appropriate and necessary for litigation efficiency.  
24 **The parties herein request an extension of the deadline to submit the Pre-Trial Order by an**  
25 **additional thirty (30) days. The parties do not seek the extension or continuance of any**  
26 **other dates.**

1        **1. Discovery Completed to Date**

2        Discovery is now closed. The parties exchanged initial and supplemental disclosures. The  
3        parties propounded written discovery in the form of interrogatories, admissions, and requests for  
4        production of documents. The parties engaged in deposition discovery and exchanged initial and  
5        rebuttal expert disclosures.

6        **2. Discovery That Remains to be Completed**

7        None.

8        **3. Reasons Why Counsel Requests the Extension to Submit the Pre-Trial Order**

9        Since participating in non-binding Mediation on August 30, 2022 and requesting the  
10       extension to submit the Joint Pretrial Order, the parties worked together to create a draft of the  
11       Joint Pretrial Order. However, they require additional time to meet and confer and to finalize the  
12       document. The parties already met telephonically one time and have another phone conference  
13       scheduled on October 11, 2022. The parties believe that the additional thirty (30) day extension  
14       of the deadline for the Pretrial Order is necessary and appropriate based upon the foregoing. The  
15       parties also believe good cause is demonstrated by the recited facts and in support of the  
16       extension of the instant deadline.

17       **4. Proposed Schedule for Completion of Outstanding Discovery**

18       The parties respectfully propose the following deadlines:

<u>Event</u>	<u>Current Deadline</u>	<u>New Deadline</u>
Last day to add parties or amend pleadings	--	Closed
Initial Expert Disclosures	--	Closed
Rebuttal Expert Disclosures	--	Closed
Close of Discovery	--	Closed

1	Dispositive Motions Deadline	--	Closed
2	Pretrial Order	October 3, 2022	<b>November 2, 2022</b>

4 DATED this 3<sup>rd</sup> day of October 2022.4 DATED this 3<sup>rd</sup> day of October 2022.

5 STOVALL &amp; ASSOCIATES

5 WINNER &amp; BOOZE

6 /s/*Ross Moynihan*6 /s/*Lara L. Miller*

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*Attorney for Defendant*

13 **ORDER**14 **IT IS SO ORDERED** this 4th day of October, 2022.

17   
 18 Layna L. Zouchah  
 19 UNITED STATES MAGISTRATE JUDGE

WINNER & BOOZE  
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